

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NEGGE SALIM TURNER,	)	
	)	
Plaintiff,	)	
v.	)	CASE NO.: <u>CV-1800796-G</u>
	)	
(1)CITY OF OKLAHOMA CITY, a political	)	
Subdivision of the State of Oklahoma,	)	
(2)OKLAHOMA CITY POLICE DEPARTMENT,	)	
Subdivision of the City of Oklahoma City;	)	
(3)KYLE HOLCOMB, Oklahoma City Police	)	
Officer, in his official and individual capacities,	)	
	)	
Defendants.	)	

**MOTION TO RESPOND TO ORDER TO SHOW CAUSE OUT OF TIME**

Comes now, Negge Turner, (hereinafter referred to as “Turner” or “Plaintiff”), a resident of Oklahoma County, by and through his attorney, Guinise M. Marshall, and requests the Court to respond to Show Cause Order out of time. In support thereof, counsel would show as follows:

1. Counsel’s computer was hacked on two occasions which resulted in e-mails not being delivered.
2. Counsel obtained help from professional sources to repair the breach and to address the inability to send or receive e-mails.
3. As to the service issue, counsel has been unable to speak with Plaintiff concerning his ability and willingness to pursue the matter. Plaintiff had a mental health issue which prevented him from pursuing the matter and Plaintiff has been receiving counseling from his health care providers at the Veterans’ Administration. Out of an abundance of caution, counsel did not serve the Complaint for concern of Plaintiff’s health with the belief and understanding that Plaintiff was not well enough to pursue the matter.

4. Plaintiff has contacted counsel and is now able to pursue the matter and has set an appointment for December 3, 2018 to discuss service and his ability to participate in the litigation.
5. Plaintiff requests until December 15, 2018 to effect service on all parties.

Respectfully submitted,

/s/Guinise M. Marshall

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